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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SDMS Document



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Ms. Janet Feldstein, Project Manager
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U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

02 AUG 1988

Dear Ms. Feldstein:

RE: SCP Carlstadt Site
Feasibility Study, Chapters 1 and 2
Alternatives Array Document Comments

The following is a submittal of NJDEP's comments pertaining to the SCP Carlstadt Draft Feasibility Study, Chapters 1 and 2 received by this office on June 17, 1988.

General Comment

This document addresses only on-site soil, sludge, and groundwater. Off-site soil and groundwater contamination is strongly suspected and must be addressed along with the stream sediments and surface water in the off-site RI to satisfy the requirement of a complete FS for the site.

Specific Comments

1. Subsurface Soils - Section 1.1.2, page 2

The FS states "The low levels of chemicals, even volatiles which have high mobility demonstrate the movement of chemicals is naturally attenuated by the clay layer." This statement is misleading as volatile concentrations "remained virtually unchanged" throughout the clay profile at RMW-5D and the other two (2) deep borings show evidence of volatiles passing through the clay layer. Volatile organic chemicals change the structure of clay compounds (Freeze, 1986). Therefore, the possibility of pollution pathways occurring vertically through the clay is possible. For these reasons the "natural attenuation" statement must be revised.

2. Potential Pathways - Section 1.2, page 3

The bedrock aquifer should not be excluded from the discussion of the other aquifers at the site. Although no contamination has been confirmed, an investigation of this third aquifer may be required.

3. Ground Water in the Water Table Aquifer - Section 1.2.1, page 3

The statement "Ground water contours of the water table aquifer suggest flow towards the center of the site as well as the perimeters.", is confusing and must be clarified. The complex flow pattern documented there is partially the result of man-made influences (e.g. mosquito trenches, fill materials, lagoons etc.) and this should be indicated.

4. Pages 19 and 52

According to N.J.A.C. 7:14A-1.9, POTW means Publicly Owned Treatment Works.

5. Extraction and air stripping alternative for the water table and fill aquifers - Sections 2.4.2 and 2.5.2, pages 52-61

The FS states "Under Prevention of Significant Deterioration of air quality regulations (PSD), it would not be necessary to control such low levels of emissions" from the air stripper. These low levels refer to an expected bulk off-gas emission rate of 1.5 tons per year of VOC for the till aquifer and 20 tons per year of VOC for the water table aquifer. NJDEP's Division of Environmental Quality would require off-gas controls as stipulated in N.J.A.C. 7:27-16 and 17 if toxic volatiles exceed 0.1 pound per hour or total volatiles exceed 3.5 pounds per hour.

6. Alternative 5 for Till Aquifer - Section 2.4.5, pages 58 and 59

This alternative refers to groundwater extraction and disposal at an "off-site treatment facility". Subsection 2.4.5.1 states "in accordance with SARA, off-site disposal is the least preferred of the alternatives." Use of the Dupont Deepwater Wastewater Treatment Facility would be treatment, not disposal. As such, this does not conflict with SARA and should not be down rated.

7. Tables 1,3,5 and 7

Each of these tables gives values for "total metals". This designation has little significance since the hazardous nature of the individual constituents are not discernible. The legend should identify which metals are included in the total. It is further recommended that individual metals be listed along with their respective amounts.

If you have any questions, please contact me at (609) 633-0701.

Sincerely,



Pamela A. Lange
Case Manager
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